

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America

v.

William Langston Douglas

Case No. 2:21-mj-30162  
Assigned To : Unassigned  
Assign. Date : 4/7/2021

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 20, 2021 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 922(g)(1)	Felon in Possession of a Firearm

This criminal complaint is based on these facts:

See attached affidavit

Continued on the attached sheet.



Complainant's signature

Brett J. Brandon, Special Agent, ATF  
Printed name and title



Judge's signature

Hon. Curtis Ivy, United States Magistrate Judge  
Printed name and title

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: April 7, 2021

City and state: Detroit, Michigan

IN THE UNITED STATES DISTRICT COURT  
FOR EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

**AFFIDAVIT IN SUPPORT OF**  
**AN CRIMINAL COMPLAINT**

I, Brett J. Brandon, being first duly sworn, hereby state:

1. I have been a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives, United States Department of Justice, assigned to the Detroit Field Division since July 2013. I graduated from the Criminal Investigator Training Program and the ATF Special Agent Basic Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia. During my employment with ATF, I have conducted and/or participated in numerous criminal investigations focused on firearms, drug trafficking violations, and criminal street gangs.

2. I make this affidavit from personal knowledge based on my participation in this investigation, including interviews conducted by myself and/or other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience.

3. ATF is currently conducting a criminal investigation concerning William Langston DOUGLAS (B/M; DOB: XX/XX/1999) for violations of 18 U.S.C. § 922(g)(1) (Felon in Possession of a Firearm), among other state and federal criminal violations.

**PROBABLE CAUSE**

4. On June 9, 2019 DOUGLAS pled guilty to one count of 18 U.S.C. § 922(g)(1). At the time of his change of plea hearing, DOUGLAS was advised by the Court that as a convicted felon, he could not possess a firearm. On December 11, 2019, DOUGLAS was sentenced in the Eastern District of Michigan to fifteen months in prison and thirty-six months supervised release.

5. On April 15, 2020, DOUGLAS was released from Bureau of Prisons custody. On that same date, Federal Probation Officer David Smith informed DOUGLAS that as a convicted felon, DOUGLAS is prohibited from possessing firearms.

6. On April 5, 2021, Federal Probation Officer David Smith confirmed he is presently supervising DOUGLAS for the above offense.

7. On April 5, 2021, I reviewed a YouTube video entitled “Eww Will – ‘FTOS” (Official Video) #Sprk”, located at

<https://www.youtube.com/watch?v=O60G8mEYUcg>. In the video, DOUGLAS is wearing a camouflage “Palm Angles” jacket, a white t-shirt underneath, light colored ripped blue jeans, black face covering, and white shoes, what appears to be a diamond watch, and what appears to be a “30 ES7M” diamond pendant. During the video, DOUGLAS is seen holding what appears to be a Century Arms Zastava PAP M92 PV AK pistol. I specifically noted the front sights, the silver colored bolt carrier, the wooden hand guards with three slots, the receiver, the magazine release, and the front handguard retainer are all consistent with the Century Arms Zastava PAP M92 PV AK pistol. I have personally seized a Century Arms Zastava PAP M92 PV AK pistol during a federal search warrant and am familiar with the serial numbers used on the firearms, specifically that the serial numbers begin with “M” and are followed by a sequence of letters and numbers.

8. Special Agent Matt Borkin downloaded a high-resolution version of the YouTube video and utilized software to enhance, but not alter the image in any way. Special Agent Matt Borkin identified the serial number as “M92PV052938”. I contacted Century Arms, who advised they imported a Century Arms Zastava PAP M92 PV AK pistol

bearing serial number “M92PV052938” from Zastava, Serbia on March 23, 2015 and shipped the firearm to a federal firearms licensee (FFL) in Grand Prairie, Texas on March 25, 2015.

9. I also noted the video appeared to be filmed inside of a residence with light colored walls, light colored wood/faux wood floors, and windows with trim and brown blinds.

10. I also noted writing on the wall next to an unidentified black male standing next to DOUGLAS in the video (Image 4). See Images 1-4 for screen captures taken from the YouTube video. The video contained “Warning” advising any “illegal materials are merely props”.

**Image 1**



**Image 2**



**Image 3**



**Image 4**



11. During 2019, I monitored the Instagram profile associated with Instagram User ID “Eww.Will7” and identified DOUGLAS as the individual user for the Instagram account.

12. On April 5, 2021, I reviewed the Instagram profile associated with Instagram User ID “Eww.Will7” and confirmed DOUGLAS continues use the Instagram account. I am aware of DOUGLAS appearance based the previous ATF investigation of DOUGLAS, being present for the arrest of DOUGLAS on June 4, 2019, as well as previously reviewing Michigan Secretary of State and Michigan Department of Corrections images of DOUGLAS.

13. On March 11, 2021, Instagram User ID “Eww.Will7” posted Image 5 of DOUGLAS and an unidentified black male standing inside of a residence with light colored walls, light colored wood/faux wood

floors, and windows with trim and brown blinds. I also noted the writing on the wall next to the window is in the same location as Image 4.

**Image 5**



14. On March 20, 2021, Instagram User ID “Eww.Will7” posted Image 6 and 7 of DOUGLAS wearing the wearing a camouflage “Palm Angles” jacket, a white t-shirt underneath, light colored ripped blue jeans, black face covering, and white shoes, what appears to be a diamond watch, and what appears to be a “30 ES7M” diamond pendant. DOUGLAS appears to be in a residence with a residence with light

colored walls, light colored wood/faux wood floors, and windows with trim and brown blinds.

Image 6



Image 7



15. On March 25, 2021, Instagram User ID “Eww.Will7” posted a trailer for the above-referenced YouTube music video. The trailer has the text, “SHOT BY @TANS710” superimposed over the video. I queried Instagram and learned Instagram User ID “Tans710” posted the same video on March 25, 2021 and tagged the location of the video as “Detroit, Michigan”.

16. On April 6, 2021, Special Agent Brandon contacted ATF Interstate Nexus Expert, Special Agent Michael Jacobs and provided a verbal description of the Century Arms Zastava PAP M92 AK pistol. Based upon the verbal description, Special Agent Jacobs advised the firearm is a firearm as defined under 18 U.S.C. § 921 and manufactured outside of the state of Michigan after 1898, and therefore had traveled in and affected interstate commerce.

17. On April 6, 2021, Probation Officer Smith advised DOUGLAS did not request permission or report leaving the Eastern District of Michigan from March 11, 2021 through March 25, 2021.

### CONCLUSION

18. Based upon the aforementioned facts stated herein, there is probable cause to believe William Langston DOUGLAS (B/M; DOB: XX/XX/1999), a convicted felon aware of his felony conviction, did knowingly and intentionally possess Century Arms Zastava PAP M92 AK pistol, a firearm having affected interstate commerce, in violation of 18 U.S.C. § 922(g)(1) – Felon in Possession of a Firearm. Said violation occurring on or about March 20, 2021, in the city of Detroit, in the County of Wayne, in the Eastern Judicial District of Michigan.

**Respectfully submitted,**

  
**Brett J. Brandon**  
**ATF Special Agent**

Sworn to before me and signed in my presence  
and/or by reliable electronic means.



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Hon. Curtis Ivy  
United States Magistrate Judge

Dated: April 7, 2021